

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**LORI HAGUE, individually, and on behalf of all  
others similarly situated,**

**Docket No. 3:21-cv-08053-ZNQ**

**Plaintiff,**

**- against -**

**SUNPATH, LTD,**

**Defendant.**

**DECLARATION OF YITZCHAK ZELMAN, ESQ. IN OPPOSITION TO  
DEFENDANT'S MOTION TO DISMISS**

Yitzchak Zelman, duly declares pursuant to 28 USC § 1746:

1. I am an attorney admitted to practice in this district and represent the Plaintiff in this action.
2. I submit this Declaration in opposition to the Defendant's Motion to Dismiss.
3. Attached as **Exhibit A** is a true and accurate copy of the Declaration of Andrew Garcia filed by the Defendant in the matter of *Robin Black v. Sunpath, LTD*, 3:21-cv-00023 (M.D.TN.).
4. Attached as **Exhibit B** is a true and accurate copy of the Complaint filed against the Defendant in the matter of *Tracey Massey v. Sunpath, LTD*, 1:19-cv-07056 (N.D. Ill.).
5. Attached as **Exhibit C** is a true and accurate copy of the Declaration of Andrew Garcia filed by the Defendant in the matter of *Tracey Massey v. Sunpath, LTD*, 1:19-cv-07056 (N.D. Ill.).
6. Attached as **Exhibit D** is a true and accurate copy of the Complaint filed against the Defendant in the matter of *Carl Moreland v. Sunpath, LTD*, 6:21-cv-00110-JDK (EDTX).

7. Attached as **Exhibit E** is a true and accurate copy of the Declaration of Andrew Garcia filed by the Defendant in the matter of *Carl Moreland v. Sunpath, LTD*, 6:21-cv-00110-JDK (EDTX).
8. Attached as **Exhibit F** is a true and accurate copy of the Complaint filed against the Defendant in the matter of *Brennan Landy v. Sunpath, LTD*, 1:19-cv-12562-IT (D. Mass.).
9. Attached as **Exhibit G** is a true and accurate copy of the Complaint filed against the Defendant in the matter of *Mark Dobronski v. Sunpath, LTD*, 2:19-cv-13094-TGB-EAS (E.D. Mich.).
10. Attached as **Exhibit H** is a true and accurate copy of the Declaration of Andrew Garcia filed by the Defendant in the matter of *Mark Dobronski v. Sunpath, LTD*, 2:19-cv-13094-TGB-EAS (E.D. Mich.).
11. Attached as **Exhibit I** is a true and accurate copy of a printout from PACER reflecting the various TCPA lawsuits filed against Defendant.
12. Attached as **Exhibit J** is a true and accurate copy of a printout of the Better Business Bureau's profile for Defendant, reflecting Defendant's statements to the BBB on March 16, 2020, June 9, 2020, January 27, 2021 and March 15, 2021 (pages 7, 8, 21, 27 of Exhibit J).
13. I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Dated: July 6, 2021

**MARCUS & ZELMAN, LLC**

By: /s/ Yitzchak Zelman  
Yitzchak Zelman (YZ5857)  
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